

DOMINIC OLIVEIRA,  
on his own behalf and on behalf of  
all others similarly situated,  
  
Plaintiffs,  
  
v.  
  
NEW PRIME INC.,  
  
Defendant.

Civil Action No. 1:15-cv-10603-PBS

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, Local Rule 16.1, and the status conference on February 26, 2019, the parties hereby submit this Amended Joint Statement.

A. **Discovery deadline:** As ordered by the Court at the status conference, discovery relating to liability shall be completed by **January 31, 2020**. This includes discovery relating to class certification issues, the named plaintiff's individual claims, generally applicable policies and practices, and merits discovery (but excluding discovery on alleged class-wide damages). The parties will complete discovery relating to class certification issues, the named plaintiff's individual claims, and generally applicable policies and practices, on or before **July 31, 2019**, in order to facilitate class certification briefing. The parties respectfully submit that further merits discovery may need to take place after the Court's ruling on class certification, to the extent that ruling

is issued after the January 31, 2020 close of discovery, but the parties will work cooperatively to minimize the need for such discovery. **B. Class and conditional certification:** Plaintiffs are to file motions for class and collective certification no later than **August 30, 2019**; Defendant's oppositions to be filed thirty days later; and Plaintiffs' replies to be filed 14 days later.

**C. Dispositive motions:** parties are to file dispositive motions no later than **February 28, 2020**; oppositions to be filed thirty days later; and replies to be filed 14 days later.

**II. Alternative Dispute Resolution:** As ordered by the Court at the status conference, the parties shall participate in mediation no later than **December 13, 2019**. The parties shall file a status report with the Court no later than **April 30, 2019**, stating whether they will use the Court's mediation program or a private mediator and the date of the scheduled mediation (and the mediator's name, if they are using a private mediator). The parties shall file a status report no later than **January 7, 2020**, informing the Court of the results of the mediation.

Respectfully submitted,

DOMINIC OLIVEIRA,  
on behalf of himself  
and all others similarly situated,

By their attorneys,

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**Dated:** March 5, 2019.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Amanda C. Machin